MIDDLEBROOKS SHAPIRO, P.C.

841 Mountain Avenue, First Floor Springfield, New Jersey 07081 (973) 218-6877 Angela N. Stein, Esq. anstein@middlebrooksshapiro.com Attorneys for Hiteshri Patel

: UNITED STATES BANKRUPTCY COURT

In the Matter of: : DISTRICT OF NEW JERSEY

:

HITESHRI PATEL, : Honorable Kathryn C. Ferguson

Chapter 11 Debtor and : Chapter 11 Debtor-in-Possession. :

: Case No. 20-17880-KCF

Hearing Date: March 30, 2021 at 10:00 a.m.

STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH LOCAL RULES OF BANKRUPTCY PRACTICE

PLEASE TAKE NOTICE that the facts movant relies upon, as set forth in the accompanying Application and Certification of Debtor, and the basis for granting the Motion for Order Authorizing Sale of Real Property Located at 10535 NE Park Ridge Way in Hillsboro, Oregon With Liens to Attach to Proceeds Pursuant to 11 U.S.C. §§ 363(b), 363(f), 365, Fed. R. Bankr. P. 4001(d), and D.N.J. LBR 6004-1; and For Related Relief (the "Motion"), do not present complicated questions of fact or unique questions of law. It is hereby submitted that no brief is necessary pursuant to D.N.J. L.B.R. 9013-1(a)(3) in the Court's consideration of the within Motion.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived, unless a timely objection is filed with this Court.

MIDDLEBROOKS SHAPIRO, P.C.

Attorneys for Chapter 11 Debtor and Debtor-in-Possession, Hiteshri Patel

/s/ Angela N. Stein

By: Angela N. Stein, Esq.

Dated: 3/3/2021